

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
GREENVILLE DIVISION**

United States of America, *ex rel.*  
Charles R. Shepherd; Danny V. Rude;  
Robert Scott Dillard; Rickey Mackey,

Plaintiff-Relators,

v.

Fluor Corporation, Inc.;  
Fluor Intercontinental, Inc.,

Defendants.

C/A No.: 6:13-cv-02428-JD

**TWELFTH CONSENT AMENDED  
CONFERENCE AND  
SCHEDULING ORDER**


Pursuant to the Federal Rules of Civil Procedure and the Local Civil Rules of this District, the Court hereby establishes the following schedule for this case.

1. Amendment of Pleadings: Any motions to join other parties and to amend the pleadings shall be filed by **July 17, 2020** absent the permission of the Court.
2. Fact Witness Disclosures: The parties shall serve all supplemental disclosures of fact witnesses pursuant to Fed. R. Civ. P. 26(a)(1)(A)(i) and produce any declarations from fact witnesses other than those to be filed in connection with dispositive motions by **December 1, 2024**. Any responsive declarations to declarations produced between the date of this Order and December 1, 2024 must be produced by **January 15, 2025**.
3. Expert Disclosures:
  - A. Plaintiff(s) shall file and serve a document identifying by full name, address, and telephone number each person whom Plaintiff(s) expects to call as an expert at trial and certifying that a written report prepared and signed by the expert pursuant to Fed. R. Civ. P. 26(a)(2)(B) or, where allowed, a report prepared by counsel has been disclosed to the other parties by **June 9, 2025**.
  - B. Defendant(s) shall file and serve a document identifying by full name, address, and telephone number each person whom Defendant(s) expects to call as an expert at trial and certifying that a written report prepared and signed by the expert pursuant to Fed. R. Civ. P. 26(a)(2)(B) or, where allowed, a report prepared by counsel has been disclosed to the other parties by **July 25, 2025**.

4. Records Custodians: Counsel shall file and serve affidavits of records custodian witnesses proposed to be presented by affidavit at trial no later than **November 5, 2025**. Objections to such affidavits must be made within 14 days after the service of the disclosures. *See* Fed. R. Evid. 803(6), 902(11), or 902(12) and Local Civil Rule 16.02(D)(3) (D.S.C.).
5. Discovery: All fact discovery shall be completed by **February 28, 2025** with the production of documents to be completed and responses to written discovery requests served by **February 15, 2023** and all depositions of fact witnesses (except for up to five of the additional depositions recently disclosed to the Court in the Parties' recently filed status report and in the Consent Motion giving rise to this Order) are to be completed by the above-referenced date, **February 28, 2025**. All expert discovery shall be completed by **August 25, 2025**. The parties shall serve all discovery requests in time for the responses thereto to be made by these deadlines. Discovery shall be deemed completed within this time only if discovery is initiated at such time as to afford the responding party the full time provided under the applicable rule of Federal Rule of Civil Procedure in which to respond prior to the discovery completion dates noted in this paragraph. **No motions relating to discovery shall be filed until counsel have consulted and attempted to resolve the matter as required by Local Civil Rule 7.02 (D.S.C.) and have had a telephone conference with Judge Dawson in an attempt to resolve the matter informally. The request for a telephone conference should be made within the time limit prescribed by local rule for filing such a motion. Attorneys should send a request for a telephone conference via e-mail to [dawson\\_ecf@scd.uscourts.gov](mailto:dawson_ecf@scd.uscourts.gov). The parties shall set forth their respective positions in their request.**
6. Motions: All dispositive motions, *Daubert* motions, and all other motions, except those to complete discovery, those nonwaivable motions made pursuant to Fed. R. Civ. P. 12, and those relating to the admissibility of evidence at trial (other than *Daubert* motions), shall be filed on or before **September 24, 2025**.
7. Mediation: Mediation shall be completed in this case on or before **November 7, 2025**. *See* Judge Dawson's Standing Order to Conduct Mediation (setting forth mediation requirements).
8. Pretrial Disclosures: No later than **thirty (30) days before the date set for jury selection**, the parties shall file and exchange Fed. R. Civ. P. 26(a)(3) pretrial disclosures. Within 14 days thereafter, a party shall file and exchange Fed. R. Civ. P. 26(a)(3) objections, any objections to use of a deposition designated by another party, and any deposition counter-designations under Fed. R. Civ. P. 32(a)(6). **Deposition designations and counter-designations must specifically identify the portions to be offered, including page and line citations.**
9. Motions in Limine: Motions in limine must be filed on or before **November 25, 2025**. Written responses are due on or before **December 23, 2025**.

10. Pretrial Briefs and Exhibits: Parties shall furnish the Court pretrial briefs 7 days prior to the date set for jury selection.<sup>1</sup> Local Civil Rule 26.05 (D.S.C.). Attorneys shall meet at least 7 days prior to the date set for submission of pretrial briefs for the purpose of exchanging and marking all exhibits. *See* Local Civil Rule 26.07 (D.S.C.).
11. Jury Selection and Trial: This case is subject to being called for jury selection and/or trial on or after **January 5, 2026**.

The parties' attention is specifically directed to Local Civil Rule 5.03 (D.S.C.) regarding the filing of confidential material. The parties' attention is also directed to the Court's website regarding instructions or other orders that may be applicable to your case.

  
Joseph Dawson, III  
United States District Judge

Dated: April 14, 2025  
Florence, South Carolina

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<sup>1</sup> The pretrial brief information found in Local Civil Rule 26.05(A)–(M) (D.S.C.) shall be submitted only to the Judge's chambers. However, pretrial brief information contained in Local Civil Rule 26.05(N)–(O) (D.S.C.) shall be served on opposing parties.